

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

GABRIEL MIRANDA, SR., and  
MARIA FUENTES, Individually  
and as Representatives of the Estate of  
GABRIEL MIRANDA, JR.,

V.

NAVISTAR, INC., NAVISTAR  
INTERNATIONAL CORPORATION,  
IC BUS, LLC, AND IC BUS OF  
OKLAHOMA, LLC

CIVIL ACTION NO. 7:18-CV-00353  
JURY

## DEFENDANT NAVISTAR, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' FIRST REQUESTS FOR ADMISSION

TO: Plaintiffs, Gabriel Miranda, Sr. and Maria Fuentes, Individually and as Representatives of the Estate of Gabriel Miranda, Jr., by and through their attorneys of record, T Nguyen and Windle Turley, Turley Law Firm, 6440 North Central Expressway, 1000 Turley Law Center, Dallas, TX 75206 and Terry P. Gorman, Gorman Law Firm, PLLC, 901 Mopac Expwy S Suite 300, Austin, TX 78746.

Pursuant to the Federal Rules of Civil Procedure, Defendant Navistar, Inc. submits its Answers to Plaintiffs' First Requests for Admission.

Respectfully submitted,

By: /s/ William J. Collins, III

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## Exhibit C

**RESPONSES TO REQUEST FOR ADMISSIONS**

**REQUEST FOR ADMISSION NO. 1:** Defendant has been correctly named in the present cause insofar as the legal designation of its name.

**RESPONSE:**

Admit

**REQUEST FOR ADMISSION NO. 2:** The court in which the action is pending has personal jurisdiction.

**RESPONSE:**

Admit

**REQUEST FOR ADMISSION NO. 2(sic):** The court in which the action is pending has subject matter jurisdiction.

**RESPONSE:**

Admit

**REQUEST FOR ADMISSION NO. 4:** Defendant designed the IC bus in question.

**RESPONSE:**

Deny as to all the component parts

**REQUEST FOR ADMISSION NO. 5:** Defendant manufactured the IC bus in question.

**RESPONSE:**

Deny as to all the component parts.

**REQUEST FOR ADMISSION NO. 6:** Defendant assembled the IC bus in question.

**RESPONSE:**

Deny as to all the component parts

**REQUEST FOR ADMISSION NO. 7:** Defendant distributed the IC bus in question.